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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
Administration of the North) CC Docket No. 92-237
American Numbering Plan)

COMMENTS OF BELLSOUTH TELECOMMUNICATIONS

BELLSOUTH TELECOMMUNICATIONS, INC.

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SUMMARY

The Commission has proposed rules that would result in significant changes in the administration of the North American Numbering Plan ("NANP"). The proposed rules should promote greater centralization and efficiency in the administration of numbering resources. Further, the changes proposed by the Commission are an initial step in the process to establish a future framework for the industry to efficiently and effectively address increasingly complex and important numbering issues.

BellSouth supports the Commission's conclusion that the administration of the NANP should be transferred to a single non-government entity that is not closely identified with any industry segment. BellSouth believes the Alliance for Telecommunications Industry Solutions ("ATIS") can play a valuable role in the sponsorship of a new World Zone 1 Numbering Forum to develop industry consensus on numbering issues and in the selection of a new NANP administrator. BellSouth does not oppose the National Exchange Carrier Association's ("NECA") assumption of NANP administrative responsibilities if the industry as a whole is satisfied with NECA's impartiality.

BellSouth also recommends that the Commission approve the creation of a new World Zone 1 Numbering Forum that would have as one of its responsibilities the coordination of a Request for Proposal ("RFP") process to select a new NANP administrator. Further, the specific requirements and

the operating parameters of the future NANP administrator can be refined in the RFP process.

In view of the Commission's plenary jurisdiction over numbering matters, the Commission should continue to provide general oversight over numbering issues. Industry fora, however, have been very successful in reaching consensus on many significant issues. BellSouth supports the continued use of industry fora as the primary venue for the resolution of numbering issues. In particular, BellSouth continues to support the use of a World Zone 1 Numbering Forum also to coordinate the examination and resolution of numbering issues.

The establishment of a World Zone 1 Numbering Forum would facilitate the efficient resolution of many numbering issues. Most recommendations from the industry involving material or significant policy issues would require final approval by the Commission. Similarly, issues that the industry can not reach consensus on may ultimately require submission to the Commission for resolution through formal proceedings.

Further, BellSouth supports the NANP administrator's assignment of all NANP resources at the NPA and Central Office (NXX) level. BellSouth also recommends that the NANP administrator's assignment responsibilities be in accordance with criteria developed by the industry and approved by the Commission.

BellSouth recommends that the cost recovery mechanism for the administration of numbering resources be based on the equitable sharing of administrative costs by entities that request or use numbering resources. Further, BellSouth is not opposed to the Commission's collection of fees related to its NANP oversight responsibilities provided the fees are quantifiable and reasonable. Similarly, the collection of fees payable to the NANP administrator is also reasonable.

BellSouth agrees with the Commission's determination that the Feature Group D (FGD) Carrier Identification Code (CIC) expansion plan developed by the industry is reasonable. BellSouth views a six year transition period as excessively long and recommends that the Commission adopt an eighteen month transition period.

The failure to provide "1+" access for intraLATA, interstate toll service does not constitute unreasonable discrimination within the Commission's rules. The Commission has previously determined that the current procedures for the provision of intraLATA interstate traffic are reasonable. That determination is correct and should be maintained.

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BellSouth Telecommunications, Inc. ("BellSouth") hereby files its Comments on the Notice of Proposed Rulemaking ("NPRM"), FCC 94-79, released by the Federal Communications Commission ("Commission") in the above-captioned docket on April 4, 1994.

I. Phase One

A. New Administrator

In the Notice of Inquiry, 7 FCC Rcd 6837 (1992), ("NOI") the Commission invited comments on the advisability of the transfer of the administration of the NANP from Bellcore to another entity.¹ In the NPRM, the Commission divided the functions performed by the NANP administrator into the following separate but related functions: policy-making, dispute resolutions, maintenance of number databases, and the processing of applications for numbers.² The Commission determined that the maintenance of database responsibilities and processing of applications for numbers should be viewed as ministerial. Based on the comments

¹ NOI, para. 23-28.

² NPRM, para. 7.

received to the NOI, the Commission has tentatively concluded that NANP administrative functions should be transferred from Bellcore to a single non-government entity that is not closely identified with any industry segment.³

BellSouth supports the Commission's conclusion that the administration of the NANP should be transferred from Bellcore to a single non-government entity that is not closely identified with any industry segment. BellSouth recognized in its Comments to the NOI that despite Bellcore's excellent managerial skills and significant technical expertise, Bellcore's performance of its NANP responsibilities was being impeded by the perception that Bellcore's affiliation with the RBOCs prevented it from performing its functions in an impartial manner.⁴ The continued need to defend against these charges would ultimately divert⁶ valuable and limited Bellcore resources from the performance of its NANP responsibilities. In its comments to the NOI, BellSouth supported the transfer of the NANP administrative function from Bellcore to another entity, if the transfer of the NANP administration was necessary to satisfy the industry of the impartiality of the NANP administrator.⁵

³ NPRM, para. 18.

⁴ BellSouth Comments, pp. 5 and 6.

⁵ BellSouth Comments, pp. 6 and 7.

In the NPRM, the Commission recognized that based on its experience and knowledge of telecommunications matters, it may be the most appropriate government entity to assume the administration of the NANP. However, the Commission determined that its performance of number assignment responsibilities and other less controversial tasks would not be the most appropriate use of the Commission's resources.⁶ The Commission, therefore, requested comments on whether an existing non-governmental entity would be appropriate to function as future administrator. In particular, the Commission has requested comments concerning whether ATIS or some component of ATIS could function as the future administrator of the NANP.⁷ The Commission observed that while in the past ATIS has been closely identified with the LEC industry segment, ATIS has expanded its governing board and membership to include entities that are not LECs.

BellSouth supports an active role for ATIS in the establishment of the future NANP framework. As a result of its expanded membership, knowledge of telecommunications matters and prior leadership concerning important telecommunications issues, ATIS can provide valuable leadership in the selection of a new NANP administrator. Given the considerable skills possessed by ATIS in sponsoring industry fora, BellSouth supports ATIS

⁶ NPRM, para. 14.

⁷ NPRM, para. 15.

sponsorship of a World Zone 1 Numbering Forum. As advocated by BellSouth in its Reply Comments, the World Zone 1 Numbering Forum should coordinate the development of a plan to effect the transfer of the NAMP administration from Bellcore.⁸ Such a plan should utilize an RFP to select the new NANP administrator.

The Commission has requested comments on whether NECA might function as future administrator of the NANP.⁹ BellSouth agrees with the Commission's observation that NECA has considerable knowledge of the telecommunications industry. BellSouth is concerned that, similar to Bellcore, NECA's impartiality may be questioned by some segments of the industry because of its traditional identification with the Local Exchange Carrier (LEC) industry segment. However, BellSouth does not oppose NECA's assumption of NANP administrative responsibilities if the industry as a whole is satisfied with NECA's impartiality.

The Commission has also requested comments on whether it should establish, subject to its oversight, a new non-government entity to handle the future administration of the NANP.¹⁰ The Commission's establishment of a new non-government entity is not necessary. BellSouth continues to recommend that the Commission approve the creation of a new

⁸ BellSouth Reply Comments, pp. 7-8.

⁹ NPRM, para. 15.

¹⁰ NPRM, para. 16.

World Zone 1 Numbering Forum and authorize that forum to develop and implement a process for the selection of a new NANP administrator.

Finally, the Commission has also requested comments on the parameters that would define the mission, management, structure, functions, personnel and other capabilities of a new NANP administrator.¹¹ In its Comments to the NOI, BellSouth stated that it supported the transfer of the NANP administration from Bellcore to another entity only if that entity had the required expertise to address both the technical and administrative responsibilities required for the administration of numbering resources. The future NANP administrator must possess the skills to perform the day-to-day administrative functions of the NANP administrator as well as possess a long term focus and commitment to the management of numbering resources.

BellSouth is concerned that the Commission and industry recognize the significance and complexity of issues that will be administrative and therefore performed by the new NANP administrator. The NANP administrator must have the skills to address these issues in an effective and efficient manner. In particular, the future administrator of the NANP must possess strong organizational and management skills as well as negotiation skills. In addition, the future administrator should have the ability to function as a

¹¹ NPRM, para. 18.

strong technical resource concerning telecommunications networks. However, BellSouth recommends that an RFP or similar process be used to identify and refine the details of the specific requirements and operating parameters of the future NANP administrator.

In summary, BellSouth concurs in the Commission's recommendation that the NANP administrative functions be transferred to a single non-government entity approved by the Commission and not closely identified with any particular industry segment. BellSouth further recommends that an RFP or similar process be used to select the new administrator of the NANP. The specific responsibilities and operating parameters of the new NANP administrator would be further refined during the RFP process. In addition, the issuance of an RFP should address the industry concerns regarding the impartiality and competency of the administrator. Finally, BellSouth recommends that the Commission approve the creation of a new World Zone 1 Numbering Forum to implement a process for the selection of a new NANP administrator.

B. Policy Making and Dispute Resolution

The Commission has requested comments on whether a new policy board should be established to assist regulators in the development and coordination of policy issues concerning numbering matters .¹² Existing industry fora have had

¹² NPRM, para. 25.

significant success in the development of industry consensus on many important numbering issues. Although BellSouth concurs in the Commission's observation that a process which relies on voluntary consensus building may sometimes be deficient in addressing matters that involve difficult disputes between parties or broad policy issues, BellSouth continues to support industry resolutions of these issues where appropriate.

In view of the Commission's plenary jurisdiction over numbering matters, the Commission should continue to provide general oversight over numbering issues and function as the final arbiter on numbering matters. The creation of a new policy board would add an unnecessary layer of bureaucracy and potential delay in the resolution of numbering matters. In addition, BellSouth opposes the concept that any decision making authority be vested in a group or board that is limited in membership. Because numbering matters that involve significant policy issues or contentious disputes may ultimately require Commission resolution, the creation of a new policy board is unnecessary.

As noted above, BellSouth supports the establishment of a World Zone 1 Numbering Forum to coordinate the examination and resolution of numbering issues. Such a forum would permit the industry to continue to use the open industry consensus process in situations where industry analysis and expertise can expedite the resolution of a particular

numbering issue. It would be anticipated that this forum would be similar in expertise to a group such as the Future of Numbering Forum (FNF).¹³ This forum should be formally recognized by the Commission and other World Zone 1 Numbering regulatory bodies and assigned the responsibility for addressing numbering issues. The World Zone 1 Numbering Forum would also be charged with working with the proper industry standards groups to coordinate industry consensus. The forum would also be open to all interested parties, including participants from all World Zone 1 countries.

The establishment of a World Zone 1 Numbering Forum would facilitate the efficient resolution of numbering issues by relying on expertise within various industry segments to refine and resolve many numbering issues. Most recommendations from a World Zone 1 Numbering Forum that involve material changes in policy would be submitted to the Commission for final approval. Similarly, issues that the industry can not reach consensus on would be submitted to the Commission for resolution through formal proceedings.

In addition, the Commission has observed that while the industry has been successful in achieving consensus on many important numbering issues, there does not exist a regular mechanism to resolve issues where consensus cannot be

¹³ While the FNF was convened by Bellcore, the FNF includes participation by a broad cross section of the industry.

reached.¹⁴ Several commenters to the NOI suggested that alternative dispute resolution techniques are not particularly useful in the resolution of certain numbering matters.¹⁵ However, BellSouth believes recent activity within the FNF to develop additional procedures to facilitate the resolution of numbering issues through some form of alternative dispute resolution has been beneficial. In particular, the procedures being examined by the FNF, involving the use of facilitators and mediators to resolve certain NANP issues, may have merit. BellSouth supports the continued efforts of the industry to determine if some forms of alternative dispute resolution would promote the timely resolution of certain numbering matters.

C. Functions of the NANP Administrative Organization

The Commission has also requested comments on whether, in addition to those functions performed by Bellcore, the new NANP administrator should assume the performance of additional functions associated with the assignment of NXX codes.¹⁶ As stated in its Comments to the NOI, BellSouth supports the NANP administrator's assignment of all NANP resources at both the NPA and NXX level.¹⁷ Further,

¹⁴ NPRM, para. 24.

¹⁵ BellSouth Comments, pp. 9 and 10, and Pacific Comments, pp. 5 and 6.

¹⁶ NPRM, para. 29.

¹⁷ Comments of BellSouth, pp. 7-9.

BellSouth recommends that the process approved by the Commission provide for sufficient coordination of Central Office code assignment responsibilities and NPA relief planning responsibilities. The Commission and the industry must ensure that NPA relief planning responsibilities are adequately addressed in the new NANP framework. There may still be a need for local coordination of NPA relief efforts even if NXX assignment responsibilities are centralized.

Further, the NANP assignment responsibilities should be in accordance with guidelines and criteria developed by the industry and approved by the Commission. The centralized assignment of numbering resources by a single organization based on uniform guidelines and criteria should promote increased consistency and efficiency in the use of numbering resources.

D. Funding for NANP Administrator

In the NOI, the Commission requested comments on the appropriate procedures for the recovery of future NANP administration costs.¹⁸ Specifically in the NPRM, the Commission has proposed a procedure for NANP funding based on a two tier framework.¹⁹ The first element of the Commission's framework is the potential establishment of Commission fees, payable by those who are assigned or benefit from the use and regulation of numbering resources.

¹⁸ NPRM, paras. 31-38.

¹⁹ NPRM, para. 38.

According to the Commission, these fees would offset the Commission's costs in the regulation of numbering resources. The second element of the Commission's framework is the establishment of a system of charges payable to the new NANP administrator to recover costs not covered by Commission's fees.

The Commission's general framework appears conceptually reasonable. The application of fees by the Commission to recover certain costs has routinely been applied to various activities. If the Commission's oversight responsibilities and related cost are clearly quantifiable and reasonable, the collection of fees is appropriate. Under BellSouth's overall proposal for NANP administration, the Commission is not expected to engage in activities significantly different from those activities currently performed by the Commission. Therefore, the Commission should not incur any significant increase in its costs. In BellSouth's view, the existing procedures to cover Commission fees should be adequate to recover the costs of the Commission's oversight responsibilities. Similarly, the Commission's proposal for the collection of fees payable to the NANP administrator for NANP administration is also reasonable.

BellSouth believes that the fundamental cost recovery mechanism for the administration of numbering resources should be based on the equitable sharing of administrative costs by entities that request or use numbering resources.

The FNF forum has also proposed fundamental funding assumptions for the recovery of cost associated with the administration of the NANP. BellSouth supports the FNF's funding assumptions. A fundamental premise of the FNF funding assumptions is that all users should share in the funding of the cost for the administration of the NANP and that the funding method should apply uniformly and in a nondiscriminatory manner. The funding method should also assess charges to the user of numbering resources in the manner costs are generated. The FNF's funding assumptions are conceptually consistent with the Commission's framework.

Further, the Commission's proposal to establish a system of charges payable to the new NANP administrator is similar to the process for collection of cost for the administration of 800 numbers. BellSouth, therefore, recommends a review of 800 number administration as a possible model for recovery of costs associated with the administration of numbering resources.

II. Phase Two - Numbering Issues

A. Feature Group D CIC Expansion

The Commission has tentatively concluded that the expansion of FGD CICs is reasonable and appropriately reflects the Commission's policy that access should be provided to all purchasers of access services without discrimination.²⁰ The Commission, therefore, concludes that

²⁰ NPRM, para. 50.

implementation of the CIC expansion plan should not be delayed.²¹ BellSouth concurs with these conclusions.

However, the Commission has proposed a transition period of six years to implement Feature Group D CIC expansion.²² BellSouth does not support the Commission's recommendation of a six year transition period to implement FGD CIC expansion. A six year transition period is excessively long. In BellSouth's view, an eighteen month transition period is reasonable and meets the needs of the industry. Based on preliminary analysis, the maintenance of a six year transition period would significantly increase administrative costs. For example, the administration and maintenance of both five digit Carrier Access Codes and seven digit Carrier Access Codes throughout the life of the permissive period will result in increased administrative costs, particularly in the area of customer education.

Further an extensive transition period would prolong the lack of dialing parity between embedded Feature Group D providers and new service providers. For calls in which customers select a carrier other than their presubscribed carrier, new service providers would be more significantly impacted by a longer permissive dialing period. In BellSouth's view, an eighteen month transition period is a reasonable period for transition to four digit CICs. An

²¹ NPRM, para. 50.

²² NPRM, para. 54.

eighteen month transition period provides LECs, carriers, and end users sufficient time for an orderly transition to four digit CICs.

B. IntraLATA Interstate Presubscription

The Commission has requested comments on whether the LECs should be ordered to cease screening and completing intraLATA interstate calls that are dialed 1+ and be required to deliver those calls to the end user's preselected carrier.²³ This issue has been raised in previous proceedings before the Commission and in those proceedings the Commission has found no obligation under its rules or decisions that require LECs to provide 1+ presubscription for intraLATA interstate traffic. In those proceedings, the Commission determined that the difference in access arrangements applicable to LEC and interexchange carriers (IXC) traffic did not constitute unreasonable discrimination under Section 202(a) of the Communications Act.²⁴

In fact, in the Commission's recent order in Allnet v. BellSouth, the Commission reaffirmed its earlier determinations that the differences in access arrangements

²³ NPRM, para. 58.

²⁴ Allnet v. Illinois Bell et al., File No. E-91-030, FCC 93-161, Memorandum Opinion and Order, released May 3, 1993; Allnet v. U.S. West, File No. E-89-38, FCC 93-162, Memorandum Opinion and Order, released May 4, 1993; Allnet v. BellSouth, File No. E-93-024, Memorandum Opinion and Order, released April 1, 1994.

available to LECs and IXC's for interstate intraLATA traffic do not represent unreasonable discrimination. In that proceeding, Allnet alleged that BellSouth had not satisfied its equal access obligation by its failure to provide "1+" dialing capability for interstate intraLATA traffic and that the failure to provide IXC's with access arrangements like those available to BellSouth's own interstate intraLATA service was discriminatory under the Commission's rules.²⁵

The Commission in that proceeding determined:

In similar complaint proceeding, we held that the Commission has not, as part of the presubscription process, required the BOCs or other LECs to provide "1+" access for interstate intraLATA MTS calls. (footnote omitted)

We also rejected arguments identical to those made by Allnet in this proceeding that the defendants' failure to provide Allnet dial-1 access for intraLATA interstate services constitutes unreasonable discrimination within the meaning of Section 202(a) of the Act. (footnote omitted) Our decision in those proceedings was based largely on our determination that, while dual or multicarrier presubscription for intraLATA interstate traffic may not be technically impossible, requiring the defendants to provide "1+" access for interstate intraLATA calls would likely entail significant administrative costs and added complexities both in terms of changing presubscription procedures and in educating consumers about a different access routine. (footnote omitted) Under those circumstances; and given the fact that we have not previously required the defendants or other LECs to provide interstate intraLATA

²⁵ Allnet v. BellSouth, Id.

presubscription, we found no basis in the record for a ruling that the defendants had acted in an unlawfully discriminatory manner. (footnote omitted) Allnet has presented no new evidence or arguments in the instant case that would persuade us to depart from our previous holdings. (footnote omitted)²⁶

Indeed, as the Commission recognized, the administrative costs and added complexities in providing 1+ access for intraLATA interstate calls are significant. In its brief in Allnet v. BellSouth, BellSouth identified the significant technical and administrative costs that would be required to provide a dual or multiple presubscription option and the complexities such alternatives would introduce into the presubscription process.

BellSouth itself estimates that the cost to provide a dual PIC option within its region would be in excess of \$59 Million. Implementation costs for a multiple PIC option are assumed to equal or exceed this figure. In addition, a multiple PIC option offers no significant advantage, given the comparatively low volume of interstate intraLATA traffic. Finally, the introduction of dual or multiple PICs would add to the complexity of presubscription and possibly increase the incidence of "slamming" and attendant customer complaints. Allnet has identified no offsetting benefits to those considerations nor has complainant show itself to be competitively damaged by the unavailability of "1+" dialing for its interstate, intraLATA traffic.²⁷

²⁶ BellSouth Comments, para. 40-41.

²⁷ Allnet v. BellSouth, BellSouth Brief, p. 13.

Moreover, the provision of "1+" access for intraLATA interstate traffic is not required under the terms of the Modification of Final Judgment.²⁸ In fact, the MFJ Court has specifically declined to require the LECs to provide presubscription for this traffic.

Under the decree and the plan of reorganization, the interexchange carriers are allowed to carry all toll calls (both inter-LATA and intra-LATA) while the Operating Companies may carry only intra-LATA calls--a significant drawback with respect to convenience. Thus, to require the Operating Companies to provide the presubscription option to the interexchange carriers would place the local companies at an almost insuperable disadvantage. This the Court will not do.²⁹

The Commission's previous determination concerning intraLATA interstate presubscription should be reaffirmed. Any proposal for the modification of the current procedures must be balanced against the significant technical and administrative costs to implement "1+" intraLATA interstate presubscription. The current procedures for the provision of interstate intraLATA traffic do not constitute unreasonable discrimination and, therefore, should be maintained.

²⁸ U.S. v. Western Electric Co., 569 F.Supp. 990, (D.C. D.C. 1983).


²⁹ U.S. v. Western Electric, p. 1108.

III. Conclusion

BellSouth supports the Commission's efforts to establish a framework for the administration of numbering resources that will be supported by all segments of the industry. The telecommunications industry is experiencing an unprecedented growth in new technologies and in the demand for communication services. Access to these new services in an efficient manner is critical to the continued growth of the industry. Further, an administrative organization with the expertise to meet current requests for numbering resources, as well as, plan for long term numbering requirements is critical to the future development and viability of the telecommunications infrastructure. The Commission's guidance in the resolution of the issues raised in this docket should facilitate the migration to a new NANP framework which will meet the important and complex needs of the industry.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this 7th day of June, 1994 served all parties to this action with a copy of the foregoing COMMENTS OF BELLSOUTH TELECOMMUNICATIONS by placing a true and correct copy of the same in the United States Mail, postage prepaid, addressed to the parties listed on the attached.


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